

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

United States Courts  
Southern District of Texas  
FILED

August 29, 2018

UNITED STATES OF AMERICA

v.

PAUL ROOSEVELT BANKS III (1)

DAVID BENFORD DORSEY (3)

KEVIN DEWAYNE HARRIS (5)

SEALED

David J. Bradley, Clerk of Court

No. 4:18CR 131  
Judge Crane

4:18mj1402

FILED

AUG 8 - 2018

Clerk, U.S. District Court  
Texas Eastern

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§1951, and 2  
(Conspiracy to Interfere with Interstate  
Commerce by Robbery, Aiding and  
Abetting)

THE CONSPIRACY

From on or about August 1, 2017, and continuing through on or about August 8, 2018, in the Eastern District of Texas and elsewhere, Paul Roosevelt Banks III, [REDACTED] David Benford Dorsey, [REDACTED] Kevin Dewayne Harris, [REDACTED] the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to

commit a certain offense against the United States, to wit: interference with commerce by robbery, in violation of 18 U.S.C. §§1951 and 2.

### **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of United States currency, from the persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

### **MANNER AND MEANS**

1. It was part of the conspiracy that **Paul Roosevelt Banks III**, [REDACTED]  
[REDACTED] **David Benford Dorsey**, [REDACTED] **Kevin Dewayne Harris**,  
[REDACTED] the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, one or more of the following robberies (loss amounts are estimated or approximate):

Date	Federal Dist.	Bank/Vendor	City	State	Loss Amount
12/1/2017	NDTX	Wells Fargo/NCR	Garland	Texas	\$53,020
12/7/2017	NDTX	BOA/NCR	Garland	Texas	\$180,000
1/18/2018	EDTX	BOA/NCR	Allen	Texas	\$53,020
1/29/2018	EDTX	Wells Fargo/NCR	McKinney	Texas	\$69,000
2/6/2018	SDTX	Chase/NCR	Laredo	Texas	\$88,200
3/8/2018	WDNC	Wells Fargo/NCR	Mooresville	N. C.	\$180,000
5/2/2018	WDMO	US Bank/Diebold	Blue Springs	MO	\$105,170

6/1/2018	WDAR	Regions Bank/NCR	Nashville	Ark.	\$63,000
8/2/2018	EDTX	BOA/NCR	Plano	Texas	\$120,427
Estimated/Approximate Total					\$911,837

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as contemplated by 18 U.S.C. §1951.

2. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:

- a. the acquisition of United States currency;
- b. the acquisition of property for use in committing robbery;
- c. the timing and means of transportation to commit robbery;
- d. the roles of participation during the preparation for and commission of robbery;
- e. plans to avoid detection and apprehension by law enforcement.

#### **OVERT ACTS OF THE CONSPIRACY**

To effect the object of the conspiracy, Paul Roosevelt Banks III, [REDACTED], [REDACTED], David Benford Dorsey, [REDACTED], Kevin Dewayne Harris, [REDACTED], the defendants, and other persons known and unknown to the Grand Jury, committed overt acts within the Eastern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about January 29, 2018, in McKinney, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, David Benford Dorsey**, and other persons known and unknown to the Grand Jury, aided and abetted each other, took personal property, consisting of United States currency, from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

2. On or about February 6, 2018, in Laredo, Texas, Southern District of Texas, **Paul Roosevelt Banks III, [REDACTED], David Benford Dorsey, Kevin Dewayne Harris, [REDACTED]** and other persons known and unknown to the Grand Jury, aided and abetted each other, took personal property, consisting of United States currency, from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

3. On or about August 2, 2018, in Plano, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, [REDACTED], David Benford Dorsey** and other persons known and unknown to the Grand Jury, aided and abetted each other, took personal property, consisting of United States currency, from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

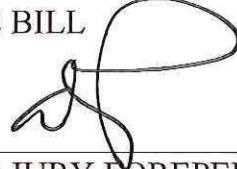
All in violation of 18 U.S.C. §§1951 and 2.

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

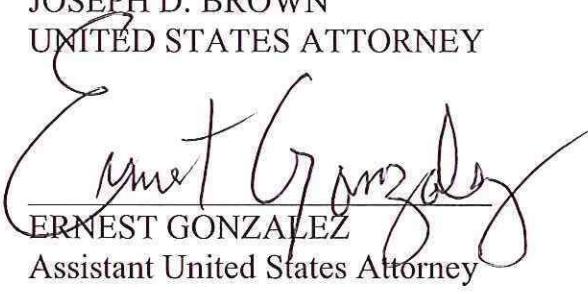
As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

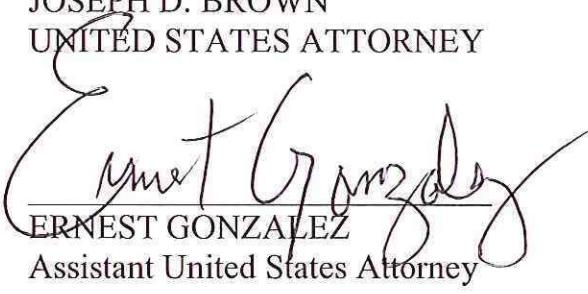
All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

  
GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

  
ERNEST GONZALEZ  
Assistant United States Attorney

  
8-8-18

Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
v.	§	No. 4:18CR
	§	Judge
PAUL ROOSEVELT BANKS III (1)	§	
DAVID BENFORD DORSEY (3)	§	
KEVIN DEWAYNE HARRIS (5)	§	
	§	

**NOTICE OF PENALTY**

**Count One**

Violation: 18 U.S.C. §§1951 and 2

Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed \$250,000.00; and supervised release of not more than three years.

Special Assessment: \$100.00

## UNITED STATES DISTRICT COURT

for the

**SEALED**

Eastern District of Texas

United States of America

v.

Case No. 4:18-cr-131 (MAC)

PAUL ROOSEVELT BANKS III (1)

)

*Defendant*

)

)

)

)

**ARREST WARRANT**

To: Any authorized law enforcement officer

**YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay**(name of person to be arrested) PAUL ROOSEVELT BANKS III

who is accused of an offense or violation based on the following document filed with the court

- Indictment     Superseding Indictment     Information     Superseding Information     Complaint  
 Probation Violation Petition     Supervised Release Violation Petition     Violation Notice     Order of the Court

This offense is briefly described as follows:

18 U.S.C. §§1951, and 2 (Conspiracy to Interfere with Interstate Commerce by Robbery, Aiding and Abetting)

Date: 08/08/2018*David A. O'Toole*

Issuing officer's signature

City and state: Sherman, TX

David A. O'Toole, Clerk

Printed name and title

**Return**

This warrant was received on (date) \_\_\_\_\_ at (city and state) \_\_\_\_\_

and the person was arrested on (date) \_\_\_\_\_

Date:

*Arresting officer's signature*

Printed name and title

AO 442 (Rev. 11/11) Arrest Warrant

## UNITED STATES DISTRICT COURT

for the

SEALED

Eastern District of Texas

United States of America

v.

Case No. 4:18-cr-131 (MAC)

KEVIN DEWAYNE HARRIS (5)

*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) KEVIN DEWAYNE HARRIS

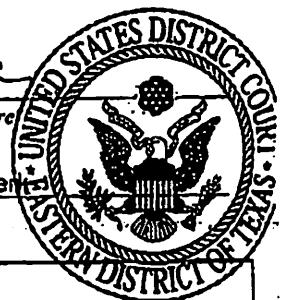
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This offense is briefly described as follows:

18 U.S.C. §§1951, and 2 (Conspiracy to Interfere with Interstate Commerce by Robbery, Aiding and Abetting)

Date: 08/08/2018

*David A. O'Toole*  
Issuing officer's signatureDavid A. O'Toole, Clerk  
Printed name and title

Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_

Arresting officer's signature

Printed name and title